

REGION 6 FASTAC IMPLEMENTATION STRATEGY

I. FIELD AND ANALYTICAL SERVICES TEAMING ADVISORY COMMITTEE (FASTAC) LIAISONS

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II. REGION 6 ANALYTICAL SERVICES DECISION TREE PROCESS

Available Analytical Services Resources

The Region 6 laboratory is located in Houston, Texas. The laboratory is staffed with EPA employees and onsite ESAT contractor employees. The Region utilizes the national Contract Laboratory Program (CLP) as a primary source for analysis of Routine Analytical Services (RAS) samples. Region 6 currently does not have any Region specific analytical services contracts and does not anticipate procuring any in the near future. We do have one Interagency Agreement (IAG) with Brooks Air Force Base for sampling and field analytical techniques. The Region has six field contracts which can subcontract for analytical services. The field contracts include two Response Action Contracts (RAC), one Enforcement Services Support (ESS) contract, one Regional Oversight Contract (ROC), one Superfund Technical Assessment and Response Team (START) contract, and one Emergency and Rapid Response Services (ERRS) contract.

Budget Resources for Analytical Services

HQ allocates a budget for each Region for Routine Analytical Services (RAS) that are processed through the CLP. The amount of the allocation varies from year to year depending on

historical usage and the available budget. If a Region does not use its entire annual allocation in the CLP, the remaining money may be given to another Region that has greater CLP usage.

Money to pay for analytical services in the field contracts or the IAG with the Air Force comes from the Region's extramural Pipeline Operations Advice of Allowance. Therefore, it is important for the Region to use all the annual CLP allocation if at all possible, thereby reducing the drain on the Region's extramural funds which are needed for many other site activities.

FASTAC Decision Tree for Analytical Services

The following recommended decision tree for analytical services was distributed to the Regions in a memorandum dated November 17, 1998, and signed by Tim Fields and Betty Bailey:

- Tier 1 – EPA Regional Laboratory and ESAT Contract
- Tier 2 – National Analytical Services Contracts (i.e., CLP)
- Tier 3 – Region Specific Analytical Services Contract
- Tier 4 - Analytical Services IAGs and Field Contracts/Subcontracts

Region 6 Implementation of Decision Tree

In Region 6, the hierarchy currently consists of Tiers 1, 2, and 4 only. The Regional Sample Control Center (R6SCC) is located in the Environmental Services Branch at the regional laboratory in Houston. The R6SCC is the group responsible for scheduling samples through the Region 6 laboratory/ESAT or the CLP.

To ensure that the users know what analytical services are available through the Region 6 laboratory/ESAT and the CLP, tables of all current services will be posted on the internet (Region 6 Laboratory web page). As new CLP contracts are awarded, the tables will be updated and a general notice via electronic mail will be sent to all Superfund employees. The Site Assessment Team Leader will be asked to notify the States as well.

[Process \(See attached flowchart\)](#)

The user contacts the R6SCC or consults/reviews the analytical services tables to determine whether his/her samples can be processed by the Regional laboratory/ESAT or CLP.

If the user determines, after reviewing the (internet) tables, that the samples can be processed through the Region 6 laboratory/ ESAT or the CLP, the user must contact Christy Macdowell, of the Region 6 Sample Control Center.

If the user determines that the samples cannot go through the Region 6 laboratory/ESAT or the CLP, the user will utilize the appropriate field contract or IAG.

If the user is unsure of the most appropriate analytical service to use, the R6SCC may be contacted for guidance.

Of the analytical services requests that go to the R6SCC, the laboratory is given the right of first refusal. The R6SCC determines if the regional laboratory has the capability and capacity to analyze the samples. Assuming the laboratory has the capability and capacity, the R6SCC will accept the samples. If the laboratory declines the samples, the R6SCC determines if the samples are CLP appropriate. If CLP appropriate, the R6SCC notifies the user and submits the analytical request forms to the CLP RSCC. If samples can be analyzed by ESAT, the R6SCC in coordination with laboratory team leaders determines which samples will be analyzed, and ESAT is notified. If samples cannot be processed through the Region 6 laboratory/ESAT or CLP, the user is notified and he/she will proceed with the field contracts option.

To document and track the samples not processed through the R6SCC (Special Analytical Services [SAS]), we are requiring the field contractors and Brooks Air Force Base to use a modified Non-CLP Analytical Services Tracking form.

Contractors will submit the modified form to the Project Officers of the individual contractor or IAG, who will provide a copy to the Superfund Quality Assurance (QA) Officer. The QA Officer will send a copy to the Contracts Management Team Leader at the Houston laboratory. The Houston Contracts Management Team staff will review the reports to determine whether the field contracts and the IAG are being used for RAS samples. Information from the forms will be entered into the Analytical Services Tracking System (ANSETS) where appropriate.

The Contracts Management Team Leaders in the Superfund Division and the Houston Laboratory (ESB) will meet quarterly to discuss the results of the reviews. If it appears Region 6 has a problem with RAS samples going to the non-CLP contracts, the Team Leaders will elevate the problem to their management and will convene a meeting to determine what corrective action should be taken.

Field Contracts

Under the RACs contracts, each contract was modified to incorporate into the contract language an analytical services delivery (ASD) plan. These plans set out the procedures for

obtaining analytical services for RAC work assignments. The plans say that generally under RAC, the Houston laboratory or the CLP will perform RAS analyses and the contractor-procured laboratories would perform SAS analyses. However, when neither the Houston laboratory or a CLP laboratory is available to perform required RAS analyses, the contractor will need to procure a subcontractor laboratory to perform those analyses. If the Houston laboratory or a CLP laboratory cannot perform the required analytical services, the EPA project manager will meet with the contractor to determine the best method of procuring the necessary analytical services. The ASD plans will be reviewed by June 30, 1999, to determine if any changes are necessary to conform with the decision tree process.

The majority of the SAS samples are processed through the START contract. The START contract supports the Removal and Site Assessment programs. Most of the Site Assessment samples go through the CLP. Most if not all of the Removal samples require a shorter turnaround time than is currently available through the laboratory or the CLP.

Region 6 has not been using the ESS contract much for analytical services. Region 6 has also not used the zone ROC contract much since its award. The analytical services provided under the ERRS contract is generally for determining where waste can be taken for disposal.

Faster Data Validation

Region 6 is in the process of developing a tiered option for data review of CLP organic data. Three-day, seven-day, and fourteen-day data review turnaround times are currently being explored. Though the tiered data review system is in the planning stage, three-day review may consist of forms review for contractual and technical compliance and raw data identification validation of target compounds with results above the contract required quantitation limit. Fourteen-day validation will consist of a manual, hard copy, raw data review.

In addition, to ensure data validation commensurate with analysis time, Region 6 will be using the Data Assessment Tool (DAT) to check contract compliance and data quality of analytical results. Region 6 currently provides a manual, hard copy validation of all CLP data packages. The turnaround time for this manual validation is approximately 14 calendar days. A Region 6 study indicates that by using DAT with a specific supplementary check system, a data review of similar quality as the Region 6 hard copy review can be provided at a substantial time savings (up to 50 percent). Utilization of DAT will be instrumental in carrying out the seven-day data review turnaround in the proposed tiered data review system.

Promoting Field Methods

The Region 6 Superfund Division has entered into an Interagency Agreement with the U.S. Air Force at Brooks Air Force Base. The agreement extends to February of 2003 and

allows for field activities such as screening and confirmation analyses. Routine field analyses are still in development. Movement towards a complete field analytical laboratory to replace traditional fixed laboratory analyses is in progress. Until a complete battery of field equipment is selected and implemented, traditional fixed lab analysis will supplement the field analysis tests.

III. WORK GROUPS PARTICIPANTS

1. Promoting Field Characterization Technologies
Superfund Division - Stan Hitt
Superfund Division - Glenn Celerier
RS&T – Ray Flores
2. Improving/Redesigning Data Assessment Tools for the CLP and Non-CLP Data:
RS&T – Melvin Ritter
3. Updating/Modifying Analytical Methods and Quantitation Levels in the CLP’s SOW and Analyzing/Restructuring the CLP Contracts:
Superfund Division – Carlene Chambers
RS&T – Marvelyn Humphrey
RS&T – Melvin Ritter

IV. TRAINING

One hour training sessions to explain the hierarchy will be conducted with the intention of reaching all users by the end of June, 1999.

V. TIMELINE

The Region intends to post the tables of available analytical services on the web page, train the users, and provide the modified Non-CLP Analytical Services Tracking Form to the RACs, ROC, ESS, ERRS, and START contractors by July 1, 1999. The field contractors will also be notified of the location of the tables when they are posted on the internet.